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State Ethics Commission

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MARYLAND STATE ARCHIVES

ANNUAL REPORT 1988



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STATE OF MARYLAND
EXECUTIVE DEPARTMENT

WILLIAM DONALD SCHAEFER
GOVERNOR



STATE ETHICS COMMISSION

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Nancy L. Speck, General Counsel

Robert A. Hahn, Staff Counsel

STATE ETHICS COMMISSION

Tenth Annual Report

January 1, 1988 - December 31, 1988

NOTE: Betty C. Nelson served on the Commission until November 1, 1988.

State Ethics Commission

Tenth Annual Report

January 1, 1988 - December 31, 1988

GENERAL STATUTORY IMPLEMENTATION

The State Ethics Commission met 13 times during Calendar Year 1988. During the year the Commission was involved in program activity relating to all areas of its statutory mandate. These include financial disclosure, conflict of interest, lobbyist disclosure, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters and public information activities.

Issuance of Advisory opinions

The Commission issues advisory opinions in response to requests from officials, employees, and others who are subject to the Law. Additionally, the Commission may issue advisory opinions to other persons. During Calendar Year 1988, the Commission received 32 requests for formal advisory opinions and issued 27 formal published opinions. There were five requests for advisory opinions pending at the end of the calendar year. All but one of the formal opinions issued in 1988 involved the conflict of interest provisions of the Law. Most of these dealt primarily with the employment or ownership interest prohibitions under section 3-103(a) of the Law. One opinion focused on gift issues and one opinion covered a lobbyist question. Two opinions dealt with State employees serving as local officials. Other areas of the Law cited in opinions include the non-participation requirements, the prohibition against using position for personal gain, the post-employment restrictions and the misuse of confidential information. One factor reducing the number of formal opinion requests and opinions issued is the large number of existing opinions that can now be used for informal guidance. The Commission staff was able to provide guidance in about 410 potential formal request situations based on existing opinions of the Commission. The Commission itself provided informal advice in lieu of formal guidance based on past opinions in 89 situations during the year. This informal guidance covered questions or issues arising under all parts of the Ethics Law. The use of informal advice by the Commission has grown rapidly with the need for quick response and the availability of precedents established in formal opinions. The Commission's informal advice workload more than doubled in 1988 resulting in the combined total of Commission formal and informal advice increasing from 61 in 1986 to 116 in 1988.

Financial Disclosure

The administration of the financial disclosure program continued to involve the identification of those required to file, providing technical assistance to filers and monitoring compliance with the Law. Compliance review of forms was conducted as part of a phased program for review of the forms of all officials and employees. Currently there are over 5,000 officials filing financial disclosure forms. In addition, copies of all judicial official financial disclosure forms are also filed at the Commission office. As part of the review program, letters are sent to filers regarding the need to provide further information in order to meet filing requirements.

In addition to the regular financial disclosure program, a substantial number of gubernatorial appointees to boards or commissions seeking limited conflict of interest exemptions from the appointing authority and from the Senate where confirmation is required must file a form disclosing areas of existing conflicts with the Commission.

Lobbyist Disclosure and Regulation

During the lobbying year which ended on October 31, 1988, 744 lobbying registrations were filed with the Commission. This represents a substantial increase from the 662 registrations in the previous year. The 744 registrations were filed by 415 different lobbyists. The 744 registrations were for 545 separate employers. (Many employers have more than one lobbyist). This is an increase from 516 employers having one or more registrants in the previous year. Although the largest number of lobbyists are registered during the legislative session, registrations are beginning and ending throughout the lobbying year, which begins on November 1 and ends on October 31 of the following year. Most persons registered to lobby have only a single registration representing one employer. However, 57 lobbyists had two or more registrations during this time period. Thirty-two registrants had four or more employers.

The 415 individuals registered as lobbyists during the reporting period was an increase from the previous year where there were 385 different individuals registered as lobbyists. The \$9,405,759 in expenditures reported for the period of October 31, 1988 represents an increase of \$1,770,927 over the previous year. Lobbying expenditures have significantly increased since the Commission reported \$2,864,454 of expenditures in 1979, the first year the Ethics Commission administered the filing program. An analysis of individual reports indicates that 38 lobbyist employers reported having total lobbying expenditures of \$50,000 or more. There were 109 lobbyist employers reporting total expenditures of \$25,000 or more. Reports of individual lobbyists registered on behalf of one or more employers indicate that 24 of these persons reported \$50,000 or more in compensation for services. Fourteen lobbyists reported compensation of \$100,000 or more. Topic areas involving large total employer expenditures during the reporting period included health, utilities, insurance, banking, business and labor. A list of those employers expending \$25,000 or more and those lobbyists reporting \$50,000 or more in compensation is included in the appendices of this report.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

	<u>10/31/86</u>	<u>10/31/87</u>	<u>10/31/88</u>
1. Expenditures for meals and beverages for officials or employees or their immediate families.	\$ 267,738	\$ 306,145	\$ 326,542
2. Expenditures for special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited. (Date, location, group benefited, and total expense for each event are also reported.)	\$ 168,663	\$ 249,584	\$ 237,111

	<u>10/31/86</u>	<u>10/31/87</u>	<u>10/31/88</u>
3. Expenses for food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting.	\$ 15,134	\$ 12,056	\$ 12,411
*4. Expenditures for gifts to or for officials or employees or their immediate families (not including sums reported in 1, 2, and 3).	\$ 228,228	\$ 295,707	\$ 131,722
<u>Subtotal of items 1, 2, 3, & 4</u>	\$ <u>679,763</u>	\$ <u>863,493</u>	\$ <u>707,785</u>
5. Total compensation paid to registrant (not including sums reported in any other section).	\$4,812,012	\$5,388,846	\$6,650,424
6. Salaries, compensation and reimbursed expenses for staff of the registrant.	\$ 342,357	\$ 437,286	\$ 632,261
7. Office expenses not reported in items 5 and 6.	\$ 465,614	\$ 462,829	\$ 623,365
8. Cost of professional and technical research and assistance not reported in items 5 and 6.	\$ 78,301	\$ 67,432	\$ 206,268
9. Cost of publications which expressly encourage persons to communicate with officials or employees.	\$ 233,396	\$ 222,431	\$ 392,268
10. Fees and expenses paid to witnesses.	\$ 5,409	\$ 10,851	\$ 9,941
11. Other expenses.	\$ 175,756	\$ 181,665	\$ 183,447
<u>Total of items 1 through 11</u>	\$ <u>6,792,428</u>	\$ <u>7,634,832</u>	\$ <u>9,405,759</u>

* This category includes the value of race track passes distributed by racing industry lobbyists to State officials. This activity began to be more fully reflected in the annual report figures in 1984. \$100,050 of the \$131,722 reported for gifts in the period ending 10/31/88 reflects value of these passes. In the previous year, \$254,620 was attributable to these passes. This represents a substantial decrease in the distribution and acceptance of these passes which reduces the expenditures reported in this category of expenses.

Enforcement Activities

The Ethics Law and implementing rules of the Commission provide that any person may file a complaint with the Commission. Complaints must be signed under oath, and allege a violation of the Law by a person subject to the Law. Additionally, the Commission may file a complaint on its own initiative, and it carries out preliminary inquiries at its discretion.

In Calendar Year 1988 the Commission issued or accepted fifty complaints. Forty-nine complaints involved financial disclosure matters, and one complaint related to conflict of interest issues. Also, during this year action was completed on ninety-three complaints. Ninety of these completed complaint cases were financial disclosure matters and three were conflict of interest matters. Thirty-four complaints were still active at the end of the Calendar Year. Fifty-seven failure to file financial disclosure complaints were terminated by accepting late filing as a cure. Twenty late financial disclosure filing cases were completed by submission of the form, an admission of violations, waiver of confidentiality, acceptance of a reprimand, and the payment of funds to the State in lieu of a potential fine. Two thousand, six hundred dollars was collected as a result of this process. Nine complaints concluded with a finding of violation of the Law after a hearing. This was a substantial increase in the number of these hearings. The processing of financial disclosure complaints has become an expensive and time consuming process. Although the number of people failing to file after two notices represents only about 2% of those required to file, the Commission believes that in lieu of resorting to court ordered fines, some financial sanction to those who continue to ignore the filing requirements, even after a hearing notice has been issued, is necessary to insure timely availability of forms. Therefore, the Commission has announced a general settlement policy of requiring an admission of violation, a reprimand, and a \$100 payment in lieu of a fine in complaint cases where there is a second complaint or where the form is filed at any time after a hearing notice is sent to the non-filer. A hearing is generally scheduled at least 90 days after the report is due and follows two other notices and a complaint document.

Three conflict of interest complaints were completed in 1988. Two complaints were completed by a dismissal based on the findings of the staff investigative report. In another complaint there was a two-day hearing that resulted in a finding of violation and a decision to seek substantial civil fines. The Respondent's appeal of the Commission's decision and the court action on a fine are still pending. The Commission also initiated seventeen preliminary inquiries regarding either conflict of interest or lobbying matters during 1988 in order to evaluate whether a complaint should be filed. Review of these inquiries is a significant part of the Commission member workload. Eighteen preliminary inquiries were still in process at the end of the year.

Local Government Ethics Laws

Maryland counties and cities are required under Title 6 of the Ethics Law to enact local laws similar to the State law. Criteria for evaluating similarity to the State Law are defined in Commission regulations. Municipalities, based on size and other factors, may be exempted from all or part of the requirement, though an exemption may be granted only in response to a written request. The Commission was primarily involved during 1988 in reviewing amendments to enacted laws.

In addition to the requirement that counties and cities enact ethics laws, the 1983 Session of the General Assembly amended the Law to require local school boards either to promulgate ethics regulations similar to the State Law or be covered by county ethics laws. The Commission issued regulations covering this requirement in 1983. Most of the staff activity relating to local ethics programs during 1988 involved providing technical assistance to local ethics officials regarding ongoing administration of local government ethics programs. A seminar for local government ethics officials was held in the fall of 1988. Eighty-five officials representing counties, cities and school boards attended this seminar. The seminar was planned by a committee composed of Commission staff, representatives from counties, municipalities and school boards.

Educational and Informational Activities

The Commission staff has been active in providing information to those covered by the Ethics Law, as well as other persons interested in its requirements. A substantial daily staff workload has involved advising employees, officials, candidates and lobbyists on how to complete forms and providing informal advice regarding possible conflicts of interest. The Commission staff has also assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to many local government ethics boards. In order to facilitate this local government assistance, a statewide educational seminar was held in Annapolis for local ethics officials. Presentations were made by the staff to various groups interested in the operation of the law. A workshop on ethics was also provided as part of the annual state employees conference.

The annual briefing for lobbyists and those interested in the operations of the lobbying law was held in Annapolis during the 1988 Session of the General Assembly. The Commission has continued to maintain an office in Annapolis during the legislative session in order to provide assistance in the completion of lobbying or financial disclosure forms. A lobbyist bulletin was introduced to help keep lobbyists informed about the requirements of the law.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. Pamphlets describing the Ethics Law have been made available to management level employees in State agencies. Another pamphlet covering ethics requirements for part-time members of State boards and commissions is also being distributed. The Commission has also initiated an ethics bulletin which covers prohibitions, rules, procedures and Commission decisions.

LEGISLATIVE RECOMMENDATIONS AND ISSUES

The Commission continues to review the adequacy of the Public Ethics Law as required by the statute. The four recommendations listed below were specifically suggested by the Commission as issues that should be addressed by legislation in the 1989 session of the Maryland General Assembly.

1. Participation in Matters Involving Adult Children

Section 3-101 of the Ethics Law prohibits an official or employee from participating in matters where the person's spouse, parent, minor child, brother or sister has an interest or is a party. The proposed legislation would add adult children to the direct participation prohibition.

This area of the Law is at issue frequently in advisory opinions and enforcement matters. Unfortunately, the Law has a significant omission in that there is no direct prohibition to keep an official from participating in matters involving an adult child. The Commission has specifically faced several serious situations where this omission has left the public or a State employee substantially unprotected from actual or potential abuse. Generally, these issues arise in the areas of procurement, personnel and regulatory action.

2. Clarifying and Strengthening Post-Employment Restrictions

The current Public Ethics Law post-employment restrictions contain very technical language requiring close analysis to determine its application. Although the Commission understands the Law's intent to protect the public interest, standing alone it has weaknesses in providing guidance and in handling enforcement cases. This is particularly true in evaluating the contact of higher level employees with primarily management responsibilities. This Commission has faced numerous post-employment matters in the past several years and has cases pending now. Most of these situations have resulted in serious appearance and conflict of interest problems. In some instances, application of the very technical standards in the current Law result in the allowance of activities that simply should not occur. The Commission believes additional more clearly stated standards of conduct will cover the kinds of specific problems the State is facing, maintain credibility in the Law, and not unduly restrict the careers of public employees. It is proposed that the current Law be supplemented with a section applying only officials other than legislators and part-time board and commission members as defined in the Law. Essentially, what is recommended is adding to the restriction a prohibition against participation for compensation in post-employment matters for one year if the matter was in existence and part of the official's responsibility during the person's last 12 months of State service.

3. Commission Fining Authority, Late Fees and Appeals

This recommended change in the Law would add to the Commission's sanctioning power by providing that after the finding of a violation, it may levy a fine not to exceed \$1,000. There is also a need to clarify the procedures and review standards in situations where Commission decisions are appealed or require additional proceedings in Circuit Court.

The Commission is concerned about its limited sanctioning powers. It can reprimand, recommend personnel action by the appointing authority, and go to court to ask for fines. Additionally, the current Law is fairly clear as to the appeal route regarding Commission decisions, but is unclear as to the timing and the evidence to be considered by the Court (possibly a different court) in levying fines. It has occurred to the Commission that it could be ruled that the action on the fines would be a separate trial *de novo* even though the underlying action of finding a violation would be an appeal on the record. The existing Law already creates a long and expensive process. Clarifying procedures would help the Commission and counsel for respondents. Generally, in conflict of interest cases the violations result in some

financial benefit to the employee. Often the possibility exists for an admission of violation in which an agreement is made to pay the gain received to the State. However, when this does not occur, the Commission believes it is left with the prospect of further protracted expensive litigation with inconsistent results where a violation is found. This means that as a practical matter in all but more serious cases there is no realistic effective way to deal with disclosure or conflict cases, particularly where employees have left their State job. In order to remedy current problems, the Commission is proposing its own limited fining authority leaving the possibility to go to court to get larger fines when necessary based on the record of the Commission proceeding. Commission proceedings are held under the Administrative Procedure Act. The Commission is also facing a substantial administrative burden in handling late filing of financial disclosure forms. Currently, each late filing required multiple notices, formal complaints and ultimately cures, settlements or formal hearings. Forty-nine of these complaints were issued in 1988. It is proposed that the Commission be given the authority to impose a late filing fee in these cases. The Commission currently has this authority for late lobbyist filing.

4. Ethics Law Coverage for High Level Contractual Employees

The Commission has been asked at various times during its existence to evaluate whether a particular contractual employee was subject to the Ethics Law. These matters have generally been resolved informally with advice that such persons were not included as employees or officials intended covered by the Law. When the Ethics Law was originally passed, contractual employees were generally used by the State on a short-term basis for ministerial tasks or to provide for some technical expertise. It was reasonable, therefore, not to require the same limits on these persons in regard to financial disclosure or conflict of interest. In the last five years this situation has been changing particularly in the Executive Branch of State government. The Commission is now encountering on a frequent basis persons heading programs, handling procurement, providing legal advice or service in other ongoing capacities that involves performing duties inconsistent with the simple concept of acquiring the short-term expert or extra clerical help. The proposed legislation would amend the definition of public official as to persons in the Executive Branch who are to work full-time for six months or more performing the duties of a public official as defined in Article 40A, §1-201(aa)(1). Then such persons would be covered by the Ethics Law for all purposes, including financial disclosure and conflicts of interest. The existing situation reduces public confidence in the ability of State government to deal with ethics problems when they become public.

Other Legislative Recommendations

The recommendations listed below were made in previous annual reports. The Commission continues to believe that these recommendations are appropriate, based on its experience in administering the ethics program:

- The Law should be formally clarified to deal with fund raising by employees and officials that is not clearly regulated by the State election laws.

- There is a need to review whether the requirement that a lobbyist must always be in the physical presence of an official in order to be required to register should be retained in the Law.

- Some consideration should be given to removing the current language dealing with Commission review of forms in section 2-103(e), and substituting a provision for review consistent with standards to be established by the Commission.
- There is a need to consider adding former officials and employees to the persons prohibited from using confidential information under section 3-107 of the Law.
- The bi-county agency ethics regulations requirements should be reviewed to make sure that sufficient penalty provisions are provided and that the regulations as drafted meet the intent of the Law.
- In order to avoid uncertain and confusing application and administration of the Law, the special provisions of section 6-202 making members of State boards funded in whole or in part by Baltimore County subject to the county disclosure law instead of the State law should be considered for elimination.
- The current Law does not seem to clearly deal with gifts from foreign governments. There is a need to review the issue and clarify the Law.
- The criteria for financial disclosure by executive and legislative branch officials utilize qualitative considerations in addition to salary. The financial disclosure standards for judicial branch employees utilize only a salary standard. As a result of this standard, certain judicial personnel such as court reporters are included in the filing requirements. The Commission believes the judicial financial disclosure standards should be amended to include qualitative criteria in addition to salary.
- The provisions for confidentiality in the Ethics Law should be revised to determine if they adequately protect privacy without denying needed information to operations agencies or the public.
- Consideration should be given to having new officials file a financial disclosure statement covering their holding as of the time when they come into their position rather than for the previous calendar year.
- The Ethics Law prohibits certain types of representation before State agencies. However, except for legislative disclosure under section 3-102 of the Ethics Law, there is no required disclosure of representation before State agencies. It is recommended that officials who appear before State agencies for compensation include on their annual disclosure form at a minimum the identity of any agencies involved in this compensated representation.
- The need for disclosure of interest in mutual funds should be reviewed to determine if this information is fully necessary to accomplish the purposes of the Law.
- The provisions of section 4-104(c) regarding attributable interests should be modified to reduce the burden caused by the disclosure requirements when a person has a small share in a large diverse testamentary trust.
- The provisions covering school board ethics regulations need to be strengthened to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.

- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other State officials.

- The Ethics Law generally requires the disclosure of interests in real property. However, an early opinion of the Financial Disclosure Advisory Board (a predecessor agency) took the position that partnership real estate did not have to be disclosed unless the filer held a one-third or greater interest in the partnership. This opinion relied on what is now the interest attribution provisions of Section 4-104(b) of the Law. The opinion has been cited to justify non-disclosure of real estate interests by some filers. The Commission does currently take the position that if property is held directly in the name of the partners instead of the name of the partnership, then disclosure is required under the current Law. The ownership of real property is one of the most important categories of disclosure under the provisions of the financial disclosure law. Under the current Law it is relatively easy to hide significant interest in real property by holding the interest in the name of a partnership. At a minimum, in order to strengthen the ability to monitor conflicts, and deter unethical behavior through disclosure, it is proposed that the Law be amended to require disclosure of property held in the name of a partnership if a 5% or greater interest in the partnership is held by the filer.

- There are various places on the current financial disclosure form where at least some minimal partnership interest disclosure might be required to be disclosed. This disclosure falls rather unevenly regarding whether a partnership gets disclosed and regarding the information to be disclosed. It is proposed that partnership interests be treated the same as interests in corporations for financial disclosure purposes. This would insure that these interests are disclosed and that important information is included in this disclosure.

- In election years improperly filed candidate's disclosure forms create unique enforcement problems. Before a violation can be found and made public a variety of confidential administrative and adjudicatory processes have to occur. In most cases this process would extend well beyond the primary election and probably beyond the general election. This means that serious completion problems or even false disclosure could exist unknown to the voting public. A review should be made by the Executive and the General Assembly to determine whether confidentiality should be eliminated for candidate's financial disclosure enforcement cases at an earlier point in the enforcement process.

- The Ethics Law prohibits employees and non-elected officials from intentionally using their prestige of office for their own private gain or that of another. Elected officials, however, are not covered by this provision. In the last ten years, the Commission has received allegations involving various elected officials under its authority alleging that they had misused their position for their own gain or gain of another. Because the Law does not cover this type of activity by elected officials, the Commission has been unable to respond to these allegations. The Commission recommends that section 3-104 of the existing Law be amended to include elected officials, or that a new provision covering these officials dealing with clear cases of abuse should be specifically added to the Law.

- Issues regarding the spouses of employees or officials have arisen in Maryland and on a national basis. The Maryland Public Ethics Law does not consistently and clearly address these issues or provide sufficient policy guidance in these matters. Spouse ethics issues have become more prevalent in part as a reflection of both spouses having careers and other economic relationships. For example, the Law does not clearly deal with the acceptability of gifts to spouses of officials or employees by prohibited donors. Additionally, the financial disclosure provisions do not clearly require gifts received by the spouse to be disclosed by the employee or official even where such gifts are from donors normally requiring official disclosure. Another significant area needing further clarification is under what circumstances is the ownership interest of a spouse to be attributed to the official or employee for conflict of interest purposes under section 3-103(a) of the Ethics Law.

APPENDIX 1

EMPLOYER SPENDING \$25,000 OR MORE - ALL REGISTRANTS - ALL TYPES OF EXPENSES

November 1, 1987 - October 31, 1988

<u>TOTAL AMOUNT</u>	<u>EMPLOYER</u>
1. \$404,706.38	Health Facilites Association of Maryland
2. 182,160.14	Maryland Chamber of Commerce
3. 159,457.69	Service Corporation International
4. 109,893.05	Maryland Bankers Association
5. 109,189.70	AAA Maryland
6. 99,114.38	MNC Financial, Inc.
7. 95,624.74	National Rifle Association
8. 90,302.89	Potomac Electric Power Company
9. 88,791.97	Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.
10. 86,663.18	Associated Builders and Contractors
11. 82,500.42	Maryland State & D.C. AFL-CIO
12. 81,218.26	C & P Telephone Company of Maryland
13. 80,825.44	Maryland State Dental
14. 80,198.47	Maryland State Teachers Association
15. 79,808.61	Maryland Classified Employees Association
16. 76,827.79	Chemical Industry Council of Maryland
17. 75,635.77	State of Maryland Institute of Home Builders
18. 74,208.62	State Farm Insurance Companies
19. 73,653.30	Citibank (MD), N.A. T/A Choice
20. 68,340.97	Tobacco Institute
21. 65,802.62	Nationwide Mutual Insurance Company
22. 65,646.29	Marylander's for the Right to Choose
23. 64,237.17	Johns Hopkins Health System

24.	63,555.96	Common Cause/Maryland
25.	61,978.03	Family Protection Lobby
26.	61,937.27	Maryland Natural Gas
27.	61,568.00	Baltimore Gas & Electric Company
28.	60,546.40	Maryland Society of Eye Physicians and Surgeons
29.	59,103.93	Bethesda Chevy Chase Chamber of Commerce
30.	57,864.95	Maryland Citizen Action Coalition
31.	57,601.24	Maryland Trial Lawyers Association
32.	56,735.13	Maryland Optometric Association
33.	56,108.89	Maryland State Bar Association
34.	56,053.95	Medical & Chirurgical Faculty of State of Md.
35.	55,001.71	First National Bank of Maryland
36.	54,739.84	Cosmetic Toiletry & Fragrance Association, The
37.	54,638.43	Cable TV Association of MD., DEL. & D.C.
38.	51,061.33	A T & T
39.	49,852.00	James T. Lewis Enterprises, Ltd.
40.	49,228.56	National Federation of Independent Businesses
41.	47,591.86	Planned Parenthood of Maryland
42.	46,459.91	CSX Transportation
43.	45,370.37	Guardian Technologies, Inc.
44.	45,224.10	Apartment and Office Building Association
45.	44,633.71	National Association of Independent Insurers
46.	44,386.82	UNISYS Corporation
47.	44,349.74	FMC Corporation
48.	42,878.79	Teamsters Public Employee Local #570
49.	42,783.13	Aerospatiale Helicopter Corporation

50.	42,442.74	R. J. Reynolds Tobacco Company
51.	41,700.00	Blue Cross and Blue Shield
52.	41,142.49	Soap and Detergent Association
53.	40,631.00	Maryland Hospital Association
54.	40,517.54	Maryland New Car and Truck Dealers Association
55.	40,466.68	Jiffy Lube International, Inc.
56.	40,439.10	AFSCME Council 92
57.	40,345.50	Rosecroft Raceway
58.	40,174.24	Maryland Association of Realtors
59.	39,709.85	Maryland Retail Merchants Association
60.	39,667.50	Household International
61.	38,435.21	Seicon Systems Control
62.	38,278.35	Maryland Farm Bureau, Inc.
63.	37,928.37	Bethlehem Steel Corporation
64.	37,501.94	Chambers Development Co., Inc.
65.	37,093.41	Montgomery County Board of Realtors
66.	36,297.38	FMC Agricultural Chemicals
67.	35,055.98	Johns Hopkins University
68.	34,942.61	Medical Mutual Liability Insurance Society of Maryland
69.	34,470.34	American Lung Association of Maryland
70.	34,406.82	Maryland Vehicle Leasing Association
71.	33,713.96	Citizens Rights Committee
72.	33,472.70	Maryland Independent College and University Association
73.	33,413.02	Maryland Land Title Association
74.	33,342.88	Southland Corporation
75.	33,064.73	Maryland Coalition of Interior Designers

76.	33,025.00	Associated Catholic Charities
77.	32,555.37	Group Hospitalization and Medical Services
78.	32,358.67	Equitable Bancorporation
79.	32,275.32	Maryland Association of Chain Drug Stores
80.	32,125.21	American Petroleum Institute
81.	32,026.30	Maryland Association of Tobacco and Candy Distributors, Inc. (MATCD)
82.	31,897.81	Maryland Security Industries
83.	30,900.00	Marine Trades Association of Maryland, Inc.
84.	30,811.14	Federated Investors, Inc.
85.	30,507.00	Association of Maryland Pilots
86.	30,000.00	Kronheim Company, Inc.
87.	30,000.00	Monumental Life Insurance Company
88.	30,000.00	Truck Renting and Leasing Association
89.	30,000.00	Prince George's County Government
90.	29,500.00	Maryland Coal Association
91.	29,398.61	American Insurance Association
92.	28,649.00	Qualified Universal Accumulation and Disbursement System
93.	28,515.70	Maryland Soft Drink Assn. Inc.
94.	28,120.67	Citicorp
95.	27,785.84	Maryland Psychological Association
96.	27,626.00	Maryland Insurance Council
97.	27,418.06	Genstar Stone Products Company
100.	27,000.00	Licensed Beverage Distributors of Md.
101.	26,944.09	Independent Insurance Agents of Md., Inc.
102.	26,628.72	Chase Manhattan Bank, N.A.
103.	26,496.00	Maryland Catholic Conference

104.	26,042.18	T. Rowe Price Associates
105.	25,973.09	Anne Arundel County Board of Realtors
106.	25,614.18	Cigna Dental Health
107.	25,091.63	Chesapeake Bay Foundation
108.	25,062.00	Maryland Psychiatric Association
109.	25,011.84	Maryland Motor Truck Association, Inc.

Note: This report does not include \$100,050 represented in the value of race track passes distributed by representatives of that industry.

APPENDIX 2

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION - ALL CLIENTS

November 1, 1987 - October 31, 1988

AMOUNT	LOBBYIST
1. \$836,867.39	Bereano, Bruce, C.
2. 266,507.66	Cooke, Ira, C.
3. 261,302.24	Doyle, James, J., Jr.
4. 227,721.00	Goldstein, Franklin
5. 199,877.41	Pitcher, J. Wm.
6. 185,189.31	McCoy, Dennis, C.
7. 183,980.43	Schwartz, Joseph A. III
8. 178,428.67	Manis, George, N.
9. 174,974.25	Doolan, Devin John
10. 153,999.94	Burridge, Carolyn, T.
11. 142,848.00	Rummage, Frederick, C.
12. 123,290.00	Adler, Maxine
13. 122,273.43	Doherty, Daniel, T.
14. 104,833.00	Goeden, James, P.
15. 75,785.00	Canning, Michael, F.
16. 74,000.00	Chew, Fred, D.
17. 71,750.00	Middleton, Michael, C.
18. 61,682.00	Enten, D. Robert
19. 60,631.00	Neily, Alice, J.
20. 59,115.28	Epstein, Harvey, A.
21. 58,004.13	Neil, John B.
22. 55,000.00	Rombro, Richard, T.
23. 54,297.44	Shaivitz, Robin, F.
24. 51,203.00	Barbera, Thomas, P.

